

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

AMINATA WILLIAMS,)
Plaintiff,) Civil Action No.
v.)
SALT'S MANAGEMENT, LLC,) JURY TRIAL DEMANDED
Defendant.)

COMPLAINT FOR DAMAGES

COMES NOW, Plaintiff Aminata Williams (“Plaintiff” or “Ms. Williams”), by and through undersigned counsel, and files her Complaint for Damages against Salt’s Management LLC, d/b/a McDonald’s (“Defendant”), and shows the Court as follows:

NATURE OF COMPLAINT

1.

Plaintiff brings this action against Defendant for violating Title VII of the Civil Rights Act of 1964 in the State of Georgia.

JURISDICTION AND VENUE

2.

Plaintiff invokes the jurisdiction of this court pursuant to 28 U.S.C. §§ 1331, and 28 U.S.C. §§ 1343.

3.

The unlawful employment practices alleged in this Complaint were committed within this district. In accordance with 28 U.S.C. § 1391, venue is appropriate in this Court.

ADMINISTRATIVE PROCEDURES

4.

Plaintiff has fulfilled all conditions necessary to proceed with this cause of action under Title VII. Plaintiff filed her Charge of Discrimination with the Equal Employment Opportunity Commission ("EEOC") on April 26, 2022; the EEOC issued its Notice of Right to Sue on July 27, 2022.

5.

Plaintiff timely files this action within ninety (90) days of receipt of the Notice of Right to Sue from the EEOC.

PARTIES

6.

Plaintiff is a Female citizen of the United States of America and is subject to the jurisdiction of this Court.

7.

At all times relevant, Defendant was qualified and licensed to do business in Georgia, and at all times material hereto has conducted business within this District. During all times relevant hereto, Defendant has employed fifteen (15) or more employees for the requisite duration under the Title VII. Defendant is therefore covered under Title VII in accordance with 42 U.S.C. § 2000e(b).

8.

Defendant may be served with process by delivering a copy of the summons and complaint to its Registered Agent, Jeff Heidrick, located at 2030 Powers Ferry Road, Suite 213, Atlanta, GA, 30339, USA.

FACTUAL ALLEGATIONS

9.

On or about March 9, 2022, Ms. Williams began working for Defendant at their McDonald's Chamblee location as a Crew Member.

10.

On or about March 24, 2022, supervisor Seema LNU, began taking condiments and stuffing them into Ms. Williams apron and touching her private parts.

11.

Ms. Williams asked Seema to stop touching her, but she continued.

12.

Ms. Williams reported sexual harassment to managers, Julie LNU and Linda LNU and called the police.

13.

Ms. Williams previously informed Defendant that she was a victim of rape and suffered from PTSD.

14.

Ms. Williams informed Julie and Linda that Seema should not have been touching her in this way and they replied that Seema was just doing her job.

15.

Defendant's HR personnel informed Ms. Williams that managers could train her but not touch her.

16.

On or about April 2, 2022, Ms. Williams met with HR Manager, Trina Massey, who asked her why she had called the police.

17.

Ms. Massey informed Ms. Williams that due to their investigation they no longer needed or wanted her.

18.

Defendant told Ms. Williams to leave and get out.

19.

Defendant stated that it terminated Ms. Williams for violating company policy.

20.

Defendant did not state which policy Ms. Williams violated or how the policy was violated.

21.

Instead, Defendant retaliated against Plaintiff by terminating her.

22.

Although Defendant purports to provide a legitimate non-discriminatory reason for the adverse action, this reason is a pre-text. Plaintiff was treated less

favorably in the terms or conditions of employment than others outside of her protected class, i.e., Protected Activity.

CLAIMS FOR RELIEF

**COUNT I: RETALIATION IN VIOLATION OF
TITLE VII OF THE CIVIL RIGHTS ACT OF 1964**

23.

Plaintiff re-alleges paragraphs 9-22 as if set forth fully herein.

24.

Defendant's actions, as detailed above, in terminating Plaintiff because of her protected activity constitutes unlawful intentional retaliation in violation of Title VII.

25.

Defendant willfully and wantonly disregarded Plaintiff's rights, and Defendant's retaliation against Plaintiff was undertaken in bad faith.

26.

Accordingly, Defendant is liable for the damages Plaintiff has sustained as a result of Defendant's unlawful retaliation.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests the Court grant:

- a) General damages for mental and emotional suffering caused by Defendant's misconduct;
- b) Punitive damages based on Defendant's willful, malicious, intentional, and deliberate acts, including ratification, condonation and approval of said acts;
- c) Special damages and/or liquidated damages for lost wages and benefits and prejudgment interest thereon;
- d) Reasonable attorney's fees and expenses of litigation;
- e) Trial by jury as to all issues;
- f) Prejudgment interest at the rate allowed by law;
- g) All other relief to which she may be entitled.

Respectfully submitted the 27th day of September, 2022.

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